

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Amro Farid,

Plaintiff

v.

Trustees of Dartmouth College,

Defendant

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Case 1:23-cv-00426-SM

DEFENDANT’S FOURTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED UPON THE PLAINTIFF

In accordance with Federal Rules of Civil Procedure 26 and 34, the Defendant, Trustees of Dartmouth College, by and through its attorneys, Devine Millimet & Branch, PA, hereby propounds the within document production requests upon the Plaintiff, Amro Farid, stating as follows:

I. Definitions

A. “Plaintiff” means Amro Farid, as well as any agents, employees or representatives acting on his behalf.

B. “Communication” means the transmittal of information, whether in the form of facts, opinions, ideas, inquiries or otherwise, and includes but is not limited to, letters, text messages, emails, and social media posts, comments, and direct messages, and any other form of written communication.

C. “Defendant” or “Dartmouth” means the Trustees of Dartmouth College, as well as any agents, employees or representatives acting on its behalf.

D. “You” and “your” refers to the Plaintiff, as well as any agents, employees or representatives acting on his behalf.

E. All other words used herein shall be accorded their usual meaning and shall be interpreted in their common and ordinary sense.

II. Instructions

A. Plaintiff is required to provide: (1) all responsive documents in his possession, custody or control; and (2) responses to the below Requests, all in the form and within the time specified by the Federal Rules of Civil Procedure.

B. These Requests are continuing in nature and shall be supplemented in accordance with the Federal Rules of Civil Procedure.

C. If any documents that are responsive to these Requests are withheld by claiming that they are privileged or protected, please produce a privilege log in the manner required by applicable law, which, among other things, sets forth the grounds of the claim and describes its general character with sufficient specificity to enable an assessment of the applicability of the claim.

D. Unless specified otherwise, the relevant timeframe for these requests is from January 1, 2015 through the present.

E. If any ambiguities are encountered when construing a Request, or any instruction, or definition, the response shall set forth the matter deemed ambiguous and the construction used in responding.

F. If, after exercising due diligence, a Request cannot be fully complied with, submit as much information as is available, explain why the response is incomplete, explain what

was done to attempt to secure the unknown information, and identify all other known sources of more complete or accurate information.

G. Plaintiff's counsel is specifically referred to the ESI Protocol to which he agreed, as stated in writing multiple times. Unless otherwise noted expressly below, the production of a load file containing industry standard metadata fields for all documents requested is not optional, and further noncompliance with this Protocol will result in sanctions motion practice.

DOCUMENT REQUESTS

1. To the extent not provided in your response to Request 11 of the defendant's first set of Requests for Production of Documents, please produce all tax returns, profit and loss statements, balance sheets, cash flow statements, income statements, K-1 forms, or other financial documentation sufficient to demonstrate the revenue, profits, earnings, and/or distributions or payments made to members, of Engineering Systems Analytics LLC, from January 1, 2019 through the present.

2. To the extent not provided in your response to Request Nos 19 or 20 of the defendant's first set of Requests for Production of Documents, please produce all communications from January 1, 2020 through the present between you on the one hand, and each individual referenced in your supplemental answer to interrogatory number 11, on the other hand, relating in any way to your claims of discrimination or retaliation, or to your mental, emotional or physical health or well-being. The individuals at issue are as follows: Inas Khayal; Jibran Ahmed; Wajdi Osman; Dana Mitra; Kamal Youcef-Toumi; Olivier de Weck; Clifton Below; Mohsen Farid; Yomn Elsayed; Sarah Farid; Aramazd Muzhikyan; Steffi Muhanji; Wester Schoonenberg; Dakota Thompson; Eric Liu; and Juan Coves.

3. Please produce the "little blue book" (and all versions and iterations of the same) about which you testified about during your deposition, which is referenced in Exhibit 14 to your deposition (please see Bates number AF015469).

4. To the extent not provided in your response to Request No. 3, above, please produce all journals, diaries, notebooks, and other similar documents that contain any entries, notations, discussions, or other writings or communications from January 1, 2019 to the present regarding any discussions and/or interactions that you had with any individuals identified in your

initial disclosures and/or your responses (including any supplemental responses) to the defendant's interrogatories, which concern and/or relate to relating in any way to your claims of discrimination or retaliation, or to your mental, emotional or physical health or well-being.

5. Please produce all documents, directories, folders, and/or files in Dropbox that relate to the IV-ACOPF paper that is at issue in the research misconduct proceedings described in your complaint, or any outlines, manuscripts, drafts, iterations or other versions of that paper, and that identify and/or demonstrate:

- a. The first date that each such document was created;
- b. The initial author of each such document;
- c. All dates that each document was revised; and/or
- d. Any changes or revisions, the substance of each change or revision, and the person making each change or revision, to any document called for by this Request.

6. Please produce or otherwise provide the defendant access to the two following Overleaf repositories: <https://www.overleaf.com/project/604d62167f4962382fd9bd2f> and <https://www.overleaf.com/project/604d5b167f49620176d9b6fb>.

Respectfully submitted,

TRUSTEES OF DARTMOUTH COLLEGE

By its attorneys,

DEVINE, MILLIMET & BRANCH, P.A.

Dated: January 23, 2025

By: /s/ Pierre A. Chabot
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